

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUN FANG,)	
)	
)	
Plaintiff,)	
)	Case No. 1:23-cv-04792
v.)	
)	Judge Sharon Johnson Coleman
)	
JOYBUY, JOYBUY AMERICA,)	
JOYBUY EXPRESS, and)	
JOYBUY FASHION,)	
)	
Defendants.)	

Stipulation of Dismissal Without Prejudice

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Jun Fang and Defendants Joybuy, Joybuy America, Joybuy Express, and Joybuy Fashion hereby stipulate and agree to dismiss all claims pending in the instant case without prejudice. Such dismissal shall convert into a dismissal with prejudice ninety (90) days after the date of this stipulation.

Each side shall bear their own costs and fees, including all attorneys' fees.

Dated: November 16, 2023

/s/ Ilya G. Zlatkin

Ilya G. Zlatkin
ZLATKIN CANN ENTERTAINMENT
4245 North Knox Avenue
Chicago, IL 60641
Telephone: (312) 809-8022
ilya@zce.law

*Attorney for Plaintiff,
Jun Fang*

Respectfully submitted,

/s/ Wallace H. Feng

David M. Airan
Nicole E. Kopinski
Wallace H. Feng
LEYDIG, VOIT & MAYER, LTD.
Two Prudential Plaza, Suite 4900
180 North Stetson Avenue
Chicago, IL 60601
Telephone: (312) 616-5600
Facsimile: (312) 616-5700
dairan@leydig.com
nkopinski@leydig.com
wfeng@leydig.com

*Attorneys for Defendants,
Joybuy, Joybuy America, Joybuy Express,
and Joybuy Fashion*